

FILED

July 07, 2021

CLERK, U S DISTRICT COURT
WESTERN DISTRICT OF TEXAS

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BY: _____
DEPUTY**SEALED**

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS SA-21-CR-00289-FB
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,**Plaintiff,****v.****JENNIFER BILES****a/k/a Jennifer Boschetti****Defendant.****INDICTMENT****Counts 1-5: 18 U.S.C. § 1344:****Bank Fraud;****Counts 6-8: 18 U.S.C. § 1028A:****Aggravated Identity Theft.**

The Grand Jury charges:

General Allegations

At all times material to this Indictment, unless otherwise specified:

The Defendant and Related Entities

1. Defendant JENNIFER BILES, a/k/a Jennifer Boschetti, resided in Bandera and San Antonio, Texas, both cities within the Western District of Texas.

2. Between in or about July of 2015 and in or about January of 2019, Defendant JENNIFER BILES, a/k/a Jennifer Boschetti was employed at the law offices of S.S., a solo practitioner who primarily worked in the Bandera, Texas area. Defendant JENNIFER BILES, a/k/a Jennifer Boschetti was employed as an office manager and administrative assistant.

The Scheme to Defraud

3. In the course of her employment, Defendant JENNIFER BILES, a/k/a Jennifer Boschetti had access to the complainant's firm operating account, interest bearing trust account, credit cards, physical checks, and other financial instruments and information. Defendant JENNIFER BILES, a/k/a Jennifer Boschetti was never given signature authority on any of these

accounts, and was never given permission to use any of the accounts at her discretion or without the approval of S.S.

4. The firm's operating account was held with a financial institution located within the Western District of Texas insured by the Federal Deposit Insurance Corporation (the "Bank").

5. Between July of 2015 and January of 2019, Defendant JENNIFER BILES, a/k/a Jennifer Boschetti abused her access to the firm accounts in multiple ways to steal and convert the funds belonging to the law firm and in the custody of the Bank to her own personal use. These schemes included, but were not limited to:

- a. Defendant JENNIFER BILES, a/k/a Jennifer Boschetti forged the signature of complainant S.S. on multiple paychecks written to herself from the operating account without his permission or authority.
- b. Defendant JENNIFER BILES, a/k/a Jennifer Boschetti used the checking and routing numbers of the firm's operating account to make payments via Automated Clearing House on her own personal credit cards.
- c. Defendant JENNIFER BILES, a/k/a Jennifer Boschetti used the company credit card to make payments for personal items and services at various online vendors including Amazon, Uber, and Google.
- d. Defendant JENNIFER BILES, a/k/a Jennifer Boschetti forged the signature of complainant on an application for an advance loan on the settlement for one of the firm's clients. \$20,000 of the advance loan was sent directly from the lending company to the firm's client and \$39,500 was transferred to the complainant's firm operating account, thereby incurring an unauthorized debt of approximately \$59,500 in the firm's name. Defendant JENNIFER BILES, a/k/a Jennifer Boschetti

then distributed these funds without complainant's knowledge or permission by forging complainant's signature on checks drawn upon the operating account.

6. As part of, and in furtherance of, the above-described schemes, the Defendant JENNIFER BILES, a/k/a Jennifer Boschetti knowingly and intentionally made multiple false representations to obtain funds under the custody and control of the Bank, including forging the signature of S.S. and authorizing wire transfer payments without permission or authority to do so.

7. As a result of Defendant JENNIFER BILES, a/k/a Jennifer Boschetti's scheme, complainant S.S. and his firm incurred a monetary loss of no less than \$100,000.

COUNTS ONE – FIVE
Bank Fraud
(18 U.S.C. § 1344)

8. Paragraphs One through Seven of this Indictment are realleged and incorporated by reference as though fully set forth herein.

9. Between on or about March of 2017 and on or about January of 2019, within the Western District of Texas, the Defendant,

JENNIFER BILES, a/k/a Jennifer Boschetti,

with the intent to defraud, did unlawfully, willfully, and knowingly devise and execute the above-described scheme to defraud complainant S.S., and to obtain money or property under the custody and control of an insured financial institution by means of materially false or fraudulent pretenses, specifically by forging the signature of S.S. on multiple checks drawn upon the Bank and made payable to the Defendant JENNIFER BILES, a/k/a Jennifer Boschetti and another individual, and initiating payments from an account held at the Bank to Biles' credit card accounts, as set forth below, all in violation of Title 18, United States Code, Section 1344.

Count	Date	Type of transaction	Amount
1	04/03/2017	ACH payment from account ending 4126 to credit card ending 3936	\$2,671.88
2	9/5/2017	Check #1023 from account ending 4126	\$1315.60
3	09/04/2018	Check #7088 from account ending 4126	\$6,000.00
4	1/14/2019	ACH payment from account ending 4126 to credit card ending 3734	\$1,892.90
5	1/31/2019	Check #7187 from account ending 4126	\$2,104.16

COUNTS SIX - EIGHT
Aggravated Identity Theft
(18 U.S.C. § 1028A)

10. Paragraphs One through Seven of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

11. Between on or about September 2017 and on or about January of 2019, in the Western District of Texas, Defendant,

JENNIFER BILES, a/k/a Jennifer Boschetti,

individually, and by aiding and abetting others known to the Grand Jury did knowingly, without lawful authority, and in violation of Title 18, United States Code, Section 1028A(a)(1), used, or caused others acting for her, to use, one or more means of identification of complainant S.S., namely, his name, signature, addresses, and bank account information. Defendant JENNIFER BILES, a/k/a Jennifer Boschetti's unlawful use of the means of identification was done during and in relation to the crime of bank fraud in violation of Title 18, United States Code, Section 1344, as set forth in Counts Two, Three, and Five above:

RETROSPECTIVE

ASHLEY C. HOFF
UNITED STATES ATTORNEY

Q/N

FOR JUSTIN CHUNG
Assistant United States Attorney